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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 MATTHEW JACKSON, an individual,

13
14 Plaintiff,

15 v.

16 UNICITY INTERNATIONAL, INC., a
Delaware corporation; ANYTIME LABOR,
17 L.L.C., a Nevada limited liability company,

18 Defendants.
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Case No.: 2:25-cv-00738-GMN-NJK

**STIPULATION TO EXTEND DEADLINE
FOR PLAINTIFF TO RESPOND TO
DEFENDANT UNICITY
INTERNATIONAL, INC.'S MOTION TO
DISMISS (ECF NO. 16)**

(FIRST REQUEST)

22 **IT IS HEREBY STIPULATED** by and between Plaintiff Matthew Jackson ("Plaintiff"),
23 by and through his respective counsel of record, and Defendant Unicity International, Inc.
24 ("Defendant"), by and through their respective counsel of record, that Plaintiff shall have until July
25 30, 2025 to file his response to Defendant's Motion to Dismiss. This Stipulation is submitted and
26 based upon the following:

27 1. Plaintiff's Complaint was filed in the United States District Court, District of Nevada
28 on April 28, 2025 and asserted claims related to Plaintiff's employment with Defendant. (ECF No.

1) 1).

2 2. On July 2, 2025, Defendant filed a Motion to Dismiss Plaintiff's Complaint (the
3 "Motion"). (ECF No. 16). Thus, Plaintiff must file a response to the Motion to Dismiss within 14-
4 days, on or before July 16, 2025. (*See* LR 7-2(b)).

5 3. Due to ongoing discussions between the Parties to submit this action to binding
6 arbitration, Plaintiff requests additional time to respond to the Motion.

7 4. The Parties have agreed to extend the deadline for Plaintiff to file his response to
8 Defendant's Motion to Dismiss by two-weeks, from July 16, 2025 to July 30, 2025, to allow the
9 Parties to further discuss the possibility of submitting this action to binding arbitration.

10 5. This is the first stipulation to extend the time for Plaintiff to respond to Defendant's
11 Motion to Dismiss.

12 6. The Parties believe these circumstances constitute good cause for granting an
13 extension. *See* Fed. R. Civ. P. 6(b)(1).

14 7. This Stipulation is made in good faith and not for the purpose of delay.

15 **SO STIPULATED.**

16 Dated this July 15, 2025.

17 **GREENBERG GROSS LLP**

17 **LITTLER MENDELSON, P.C.**

18 /s/ Marian L. Massey

18 /s/ Taylor A. Buono

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22 Attorneys for Defendant Unicity International, Inc.

23 **IT IS SO ORDERED:**

24 Dated this 15 day of July, 2025.

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28 UNITED STATES DISTRICT JUDGE